## BURSOR FISHER

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November 30, 2018

## **VIA ECF**

The Honorable J. Paul Oetken United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Hunter v. Time Warner Cable Inc., 1:15-cv-06445-JPO-JLC

Dear Judge Oetken:

My firm represents Plaintiffs Leona Hunter and Anne Marie Villa ("Plaintiffs") in the above-referenced action. Pursuant to Rule 2.E of Your Honor's Individual Practices, Plaintiffs respectfully request leave to file under seal the November 30, 2018 Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Class Certification, the Declaration of Joshua D. Arisohn, and Declaration of Colin Weir.

On December 15, 2015, the Court signed a Stipulated Protective Order ("Protective Order") in this case. ECF No. 34. That Order was modified by the Court on April 26, 2016. ECF No. 53. Plaintiffs' current filing contains proprietary business information and personally identifiable information that the parties have designated as confidential under the Protective Order. Plaintiffs therefore seek to file the documents under seal to avoid public disclosure of this sensitive information. Specifically, Plaintiffs seek to file the following documents under seal:

- Memorandum of Law In support Of Plaintiffs' Motion For Class Certification, Appointment Of Class Representatives, And Appointment Of Class Counsel
- Declaration of Joshua D. Arisohn, Exs. 1-3, 5-6
- Declaration of Colin B. Weir

A copy of these documents are concurrently being e-mailed to chambers in both unredacted and highlighted forms.

Very truly yours,

Joshua D. Arisohn

CC: All counsel of record (via ECF)